

1 Ford Greene
California State Bar No. 107601
2 HUB LAW OFFICES
711 Sir Francis Drake Boulevard
3 San Anselmo, California 94960-1949
Telephone: 415.258.0360
4 Telecopier: 415.456.5318
5 Attorney for Defendant
GERALD ARMSTRONG
6

FILED

AUG 29 1994

HOWARD HANSON
MARIN COUNTY CLERK
By J. Steele, Deputy

7
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF MARIN

10 CHURCH OF SCIENTOLOGY INTERNATIONAL,)
a California not-for-profit)
11 religious corporation,)
12 Plaintiff,)
13 vs.)
14 GERALD ARMSTRONG; MICHAEL WALTON;)
THE GERALD ARMSTRONG CORPORATION)
15 a California for-profit)
corporation; DOES 1 through 100,)
16 inclusive,)
17 Defendants.)

No. 157 680

EVIDENCE IN SUPPORT OF
GERALD ARMSTRONG'S
OPPOSITION TO CSI'S
MOTION FOR SUMMARY
JUDGMENT

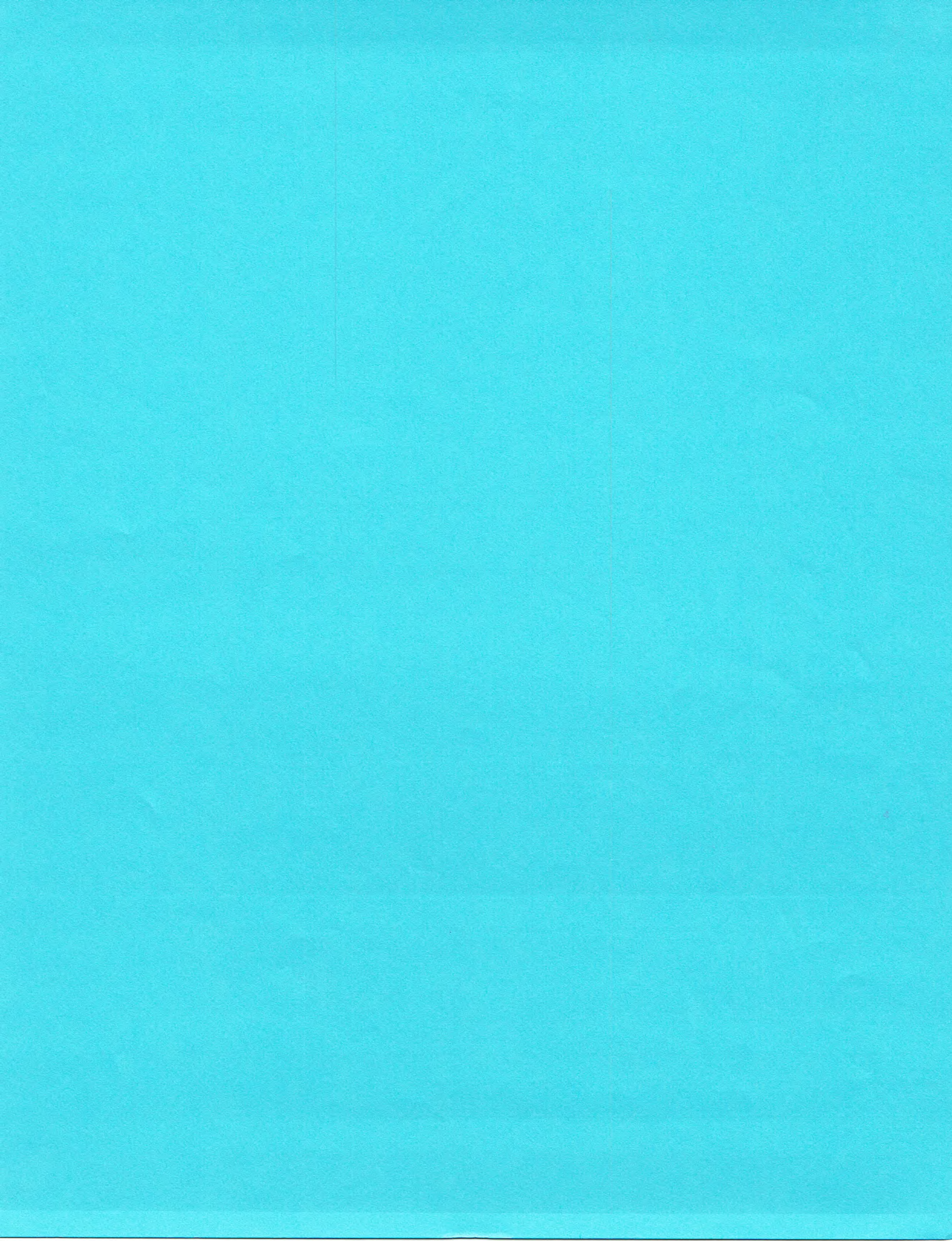
Date: September 9, 1994
Time: 9:00 a.m.
Dept: One
Trial Date: 9/29/94

19
20 VOLUME III

RECEIVED

AUG 29 1994

HUB LAW OFFICES



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF MARIN

---o0o---

CHURCH OF SCIENTOLOGY,)
INTERNATIONAL, A California)
Not-For-Profit Corporation,)
)
Plaintiffs,)
)
vs.)
)
-GERALD ARMSTRONG, MICHAEL)
WALTON, et al.,)
)
Defendants.)
_____)

CERTIFIED COPY

No. 157 680

DEPOSITION OF

GERALD ARMSTRONG

---o0o---

Thursday, March 17, 1994

REPORTED BY: Sheenagh M. Carlson, CSR NO. 8350

1 break?

2 THE WITNESS: Yes.

3 MR. WILSON: I guess we're taking a
4 break now.

5 (Recess taken.)

6 MR. WILSON: What was the last
7 question?

8 (Record read.)

9 THE WITNESS: Well, this was in the
10 beginning of August, and the crisis in the Middle
11 East began to develop and I sensed that it was a
12 very serious matter. And I guess really, inside
13 Scientology I was something of a -- for the
14 organization, I was something of a rebel inside and
15 I had begun to develop my own mind independent of
16 Scientology and began to think things through
17 myself.

18 And then when I left the
19 organization, I continued on in that direction and
20 I want, I guess I, you know, I've had a concern for
21 a long time about the state of the world. And I
22 also had begun to pursue a relationship with God.
23 And when this buildup began to happen and, you
24 know, I watched it like most of the people in this
25 country did on television day after day.

1 And being concerned, I asked what I
2 could do or what I should do, what was wanted of
3 me. I had already begun to understand the concept
4 of guidance and I had already, even prior to '86,
5 back in '84, I had considered that I could
6 communicate with God and that we had dialogue
7 sometimes and I was able to dialogue by writing.

8 And so at this time, as I sometimes
9 will do, I asked for guidance. And the message
10 that I got was to give everything away. Take only
11 what I need. And I didn't know what that really
12 meant in life at the time, but as I began to
13 meditate on that, I began to understand how that
14 really did apply to me. And it was at that time
15 that it came to me that I would forgive all the
16 debts that were owed to me and that I would take
17 only what I needed.

18 And I was at that time occupying the
19 house with Mr. Walton and I had a commitment to him
20 because I had, you know, essentially brought him up
21 to Marin County from Southern California. And I
22 had, I wanted to carry through on my commitment to
23 him and make good on that promise so that, that
24 really was why I ended up conveying the house to
25 him.

1 And I also was, as you know, the
2 owner of the, all the stock in my corporation at
3 that time which I had, I had developed some things.

4 But it really existed as a sort of a
5 future commercial hope at that time, and I had
6 transferred all of my writings and drawings and
7 stuff to the corporation in '88 and had maintained
8 it into this time in 1990. And I wanted to. That
9 was a major asset to me, and I thought at that time
10 that I would give that to four of my very good
11 friends in in the hope that they could or would do
12 with it whatever they wanted and it could be
13 commercially viable for all of them and a lot of
14 fun.

15 And so I didn't know about all the
16 details at the time, but I knew that, the broad
17 concept, and so I did, I went ahead on the basis of
18 that conviction that I could do something in life.

19 And then I did, as you know, I wrote
20 a series of articles or essays or letters regarding
21 the Middle East crisis as it built up. And being
22 unencumbered, I also offered, offered myself at
23 that time -- and this was something that, this was
24 not -- that aspect of it was not an original I had
25 at that time, because I had done the same thing

1 some years before. So it wasn't -- in a sense it
2 was, you know, precipitated by the Middle East
3 crisis and in a sense it was just a logical
4 progression and logical place that I came to after
5 everything else in my life had happened. And I
6 mean, there's no doubt in my mind that I have been,
7 I guess, both affected by my life with Scientology
8 and just who I am.

9 MR. WILSON: All right. Mark this,
10 would you please?

11 THE WITNESS: And I guess too, you
12 know, I really -- I think about things that -- and
13 you can probably know from the thought that I've
14 given money through the last many years, that I
15 recognize its intrinsic valuelessness. So that
16 was, you know, that had to kind of be in place in
17 order for everything else to happen.

18 But that's, that's an aspect of it.
19 And, you know, I have, I've not -- I really
20 believe, even though it's hard to see and although
21 sometimes it's difficult to continue to exist, I
22 think that all of my decisions along the way
23 evidence in fact guidance, and that I could not
24 have done it. I can't do this. I mean, I, you
25 guys beat me a long time ago.

1 MR. WILSON: Could you mark this,
2 please?

3 (Whereupon, Exhibit No. 1 was marked
4 for identification.)

5 MR. WILSON: Marked as Exhibit 1, I
6 only have two copies but I'll -- can you share one?

7 MR. WALTON: I'll look at his.

8 MR. WILSON: Can you share with
9 Gerry?

10 MR. GREENE: Fortunately, it's not
11 important.

12 MR. WILSON: It's not exactly a
13 major document here.

14 Q. Could you identify what's been
15 marked as Exhibit 1?

16 A. Yes.

17 Q. What is that please? Is that your
18 handwriting?

19 A. Yes.

20 Q. Okay.

21 A. And that was when, that's sometimes
22 how messages come to me and that's how that one
23 came to me and so it's a dialogue. Those are my
24 words. And of His words.

25 Q. By His words, you mean God's words?

1 A. Uh-uh.

2 Q. God's words are keep nothing, give
3 what you have to the poor and take only what you
4 need?

5 A. Yes.

6 Q. And so in giving away your assets,
7 you were following what God was telling you to do;
8 is that basically yes?

9 A. Uh-huh.

10 MR. GREENE: Please answer audibly,
11 Gerry.

12 MR. WILSON: And you shouldn't have
13 waived all those admonitions, Ford, and maybe he
14 wouldn't have done that.

15 Q. Now, so you basically kept nothing;
16 is that right?

17 A. Right.

18 Q. You gave everything to the poor?

19 A. Yes.

20 Q. So that means that you considered
21 Mr. Walton to be poor at the time?

22 A. Uh-huh. I, you know, that -- I,
23 myself asked that at the time, and when I looked
24 around at all of the people who were the recipients
25 of this, I saw that there wasn't any other way to


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

STATE OF CALIFORNIA)
) SS
COUNTY OF SONOMA)

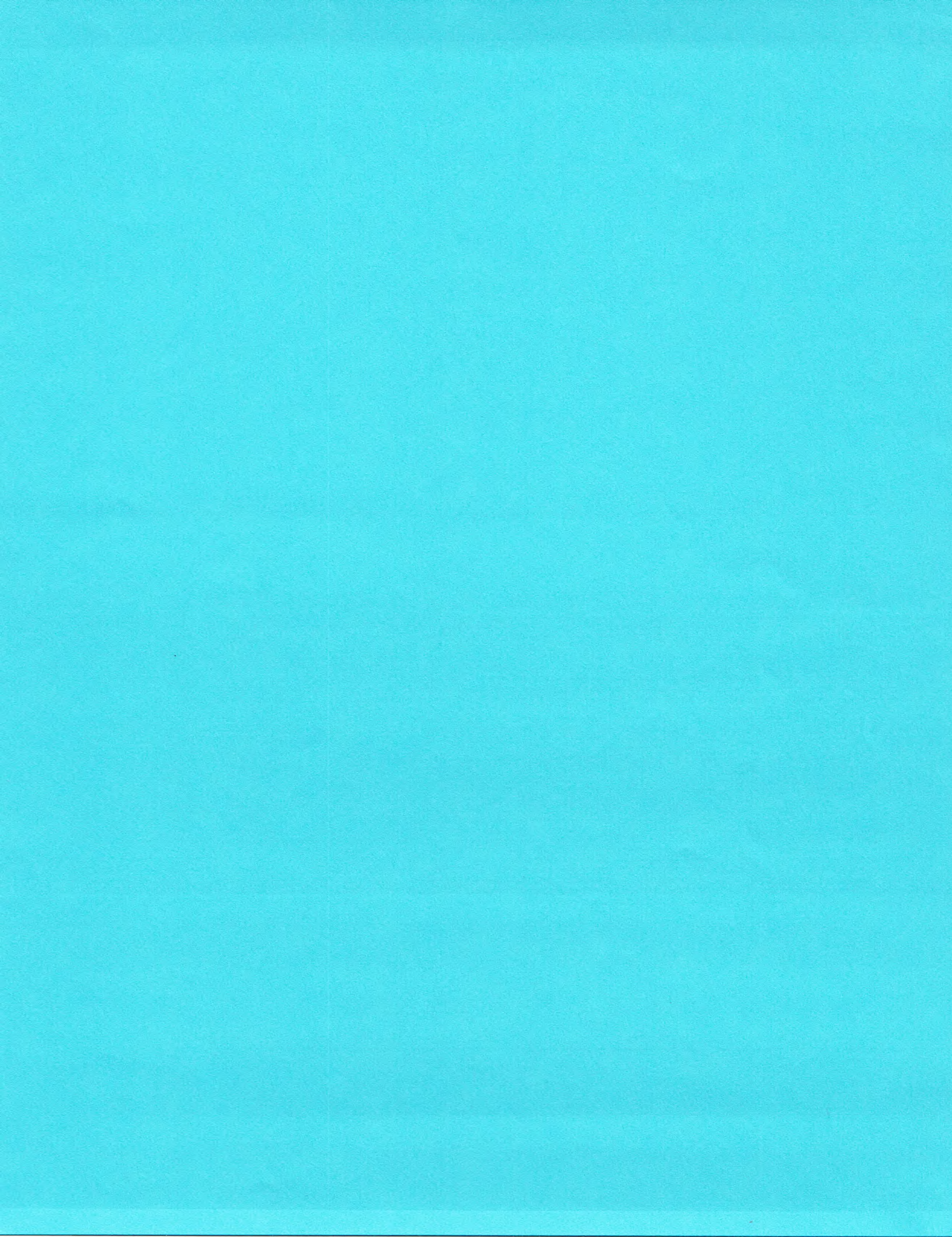
I, SHEENAGH M. CARLSON, holding CSR License Number 8350, hereby certify that, pursuant to Notice to take the foregoing deposition, said witness was by me duly sworn to tell the truth, the whole truth and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place stated herein; that the testimony of the said witness was recorded by me by stenotype, and that the said deposition was under my direction thereafter reduced to computer transcript and, when completed, was available to said witness for signature before any Notary Public,

I further certify that I am not of counsel or attorney for either of the parties to said deposition nor in any way interested in the outcome of the cause named in the caption.

IN WITNESS WHEREOF, I have hereunto set my hand this day of Tuesday, March 29th, 1994.



Sheenagh M. Carlson, CSR 8350
Certified Shorthand Reporter.



1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF MARIN

--oOo--

CERTIFIED COPY

CHURCH OF SCIENTOLOGY
INTERNATIONAL, a California
not-for-profit religious
corporation,

Plaintiff,

vs.

No. 157 680

GERALD ARMSTRONG; MICHAEL
WALTON; THE GERALD ARMSTRONG
CORPORATION, a California
for-profit corporation;
DOES 1 through 100, inclusive,

Defendants.

DEPOSITION OF

MICHAEL L. WALTON

FRIDAY, MARCH 18, 1994

202261

REPORTED BY: JOANNE M. FARRELL, CSR NO. 4838

1 make that statement to you?

2 A. Not that I recall.

3 Q. Okay. Did he ever tell you what his
4 intentions were with regard to this, why was he
5 doing it?

6 A. Yes, he did.

7 Q. What did he say?

8 A. He said a number of things to me.
9 I'm trying to separate what I know now from what
10 he said yesterday at the deposition from what he
11 specifically told me at that time. Basically,
12 that it was right to do; he was guided to do it.

13 And over the course of time, I think I told
14 you this last time you took my deposition, I
15 questioned him at some length when I determined
16 that he was really serious to try to find out what
17 was going on.

18 I have known Gerry to become especially
19 depressed during some of this Scientology
20 litigation over the past 15, 14 years, has it
21 been, 14 years, and quite frankly, when he told me
22 he was going to do this, I was afraid he was going
23 to kill himself.

24 So I questioned him at some length to make
25 sure that this was something that was a positive

202289

1 thing for him and not something that was a
2 negative thing. My initial response when he told
3 me was fear. I was afraid for Gerry.

4 Upon pressing, upon further conversations
5 over the course of, I suppose, about two weeks,
6 Gerry told me that it was really something that
7 had come to him from God. And when he told me, it
8 was a positive, pleasant experience that he seemed
9 to be portraying. I felt much comforted and after
10 that, I didn't ask him much more about it.

11 Q. Okay. What did he give you?

12 A. He gave me whatever interest he had
13 in the house at that time; he gave me a kitchen
14 table; and I'm not sure about the ladder.

15 Q. Okay. And what about the debt, did
16 he forgive the debt?

17 A. Forgave the debt.

18 Q. That was at that time?

19 A. Right.

20 Q. Were there any documents executed to
21 show the forgiveness of the debt?

22 A. Yes.

23 Q. What?

24 A. There was the return of the original
25 note with some forgiving language. I don't

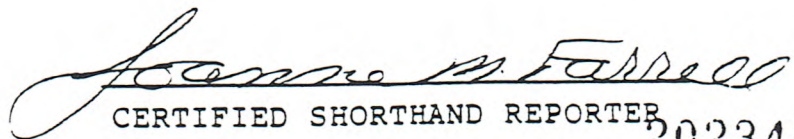
202290

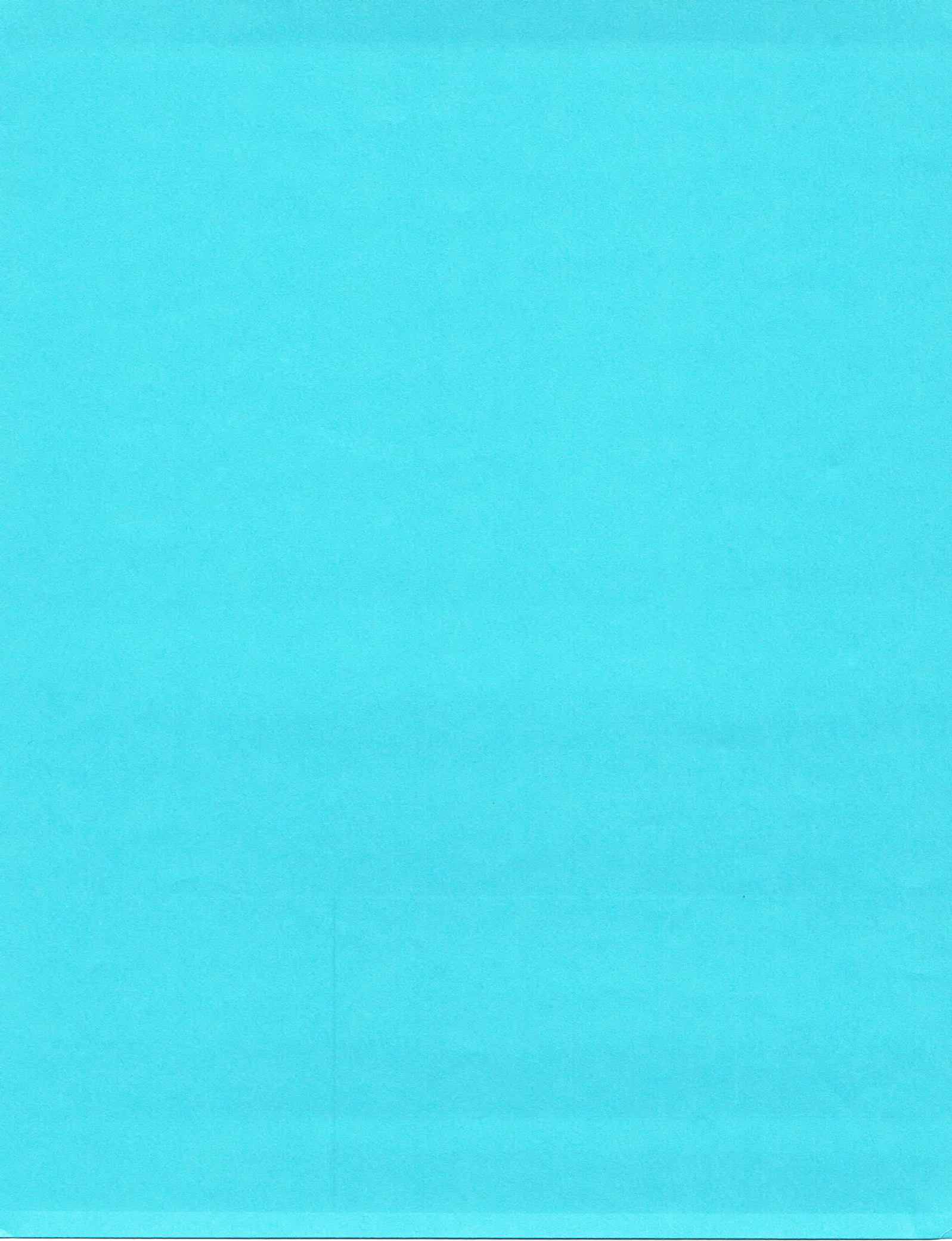
CERTIFICATE OF REPORTER

I, the undersigned, a Certified Shorthand Reporter of the State of California, hereby certify that the witness in the foregoing deposition was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth in the within-entitled cause; that said deposition was taken at the time and place therein stated; that the testimony of said witness was reported by me, a Certified Shorthand Reporter and disinterested person, and was thereafter transcribed under my direction into typewriting; that the foregoing is a full, complete and true record of said testimony; and that the witness was given an opportunity to read and, if necessary, correct said deposition and to subscribe the same.

I further certify that I am not of counsel or attorney for either or any of the parties in the foregoing deposition and caption named, nor in any way interested in the outcome of the cause named in said action.

IN WITNESS WHEREOF, I have hereunder set my hand and affixed my signature this day MAR 28 1994, 1994


CERTIFIED SHORTHAND REPORTER
STATE OF CALIFORNIA 202348



1 Ford Greene
California State Bar No. 107601
2 HUB LAW OFFICES
711 Sir Francis Drake Boulevard
3 San Anselmo, California 94960-1949
Telephone: (415) 258-0360
4 Telecopier: (415) 456-5318

5 Attorney for Defendant
GERALD ARMSTRONG
6
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 FOR THE COUNTY OF MARIN

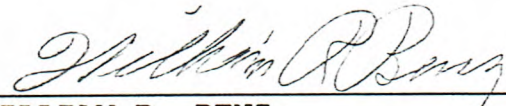
11 CHURCH OF SCIENTOLOGY INTERNATIONAL,) No. 157 680
a California not-for-profit)
12 religious corporation,)
13 Plaintiff,) CONFIRMATION OF PROTECTIVE
14 vs.) ORDER RE: DISTRIBUTION OF
15 GERALD ARMSTRONG; MICHAEL WALTON;) DOCUMENTS PRODUCED BY
16 THE GERALD ARMSTRONG CORPORATION,) GERALD ARMSTRONG AND THE
17 a California for-profit) GERALD ARMSTRONG
corporation; DOES 1 through 100,) CORPORATION TO CSI AFTER
inclusive,) IN CAMERA REVIEW
18 Defendants.)
19 Trial Date: 9/29/94

20 Immediately prior to Gerald Armstrong's deposition session of
21 March 17, 1994, and after acting as Referee appointed by the Court
22 in this case, I had conducted an in camera review of certain
23 documents that Mr. Armstrong and the Gerald Armstrong Corporation
24 had produced in response to CSI's First and Second Requests for
25 Production to Gerald Armstrong and CSI's First Second Request for
26 Production to The Gerald Armstrong Corporation, I produced certain
27 of those documents to CSI pursuant to a protective order to which
28 the parties stipulated on that date.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Said protective order was that the distribution of said documents was to be limited to the attorneys in this litigation and the use of said documents would be restricted to this litigation.

DATED: 8/25/94



WILLIAM R. BENZ
Court Appointed Discovery Referee

1 HUB LAW OFFICES
Ford Greene, Esquire
2 California State Bar No. 107601
711 Sir Francis Drake Boulevard
3 San Anselmo, California 94960-1949
Telephone: (415) 258-0360
4 Telecopier: (415) 456-5318

5 Attorney for Defendant
GERALD ARMSTRONG
6
7

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 IN AND FOR THE COUNTY OF MARIN
11

12 CHURCH OF SCIENTOLOGY) No. 157 680
INTERNATIONAL, a California)
13 not-for-profit religious)
corporation;) CROSS-COMPLAINANT AND
14) DEFENDANT ARMSTRONG'S FIRST
Plaintiffs,) INSPECTION DEMAND TO PLAINTIFF
15 vs.) AND CROSS-DEFENDANT CHURCH OF
16) SCIENTOLOGY INTERNATIONAL
GERALD ARMSTRONG; MICHAEL)
17 WALTON; THE GERALD ARMSTRONG)
CORPORATION, a California)
18 for-profit corporation; DOES)
1 through 25, inclusive,)
19 Defendants.)
20)
21)
AND RELATED CROSS ACTION)
22)
23)

24 TO PLAINTIFF CHURCH OF SCIENTOLOGY INTERNATIONAL AND ITS ATTORNEYS
OF RECORD:

25 PROPOUNDING PARTY: Cross-Complainant and Defendant GERALD
ARMSTRONG
26
27 RESPONDING PARTY: Cross-Defendant and Plaintiff CHURCH OF
SCIENTOLOGY INTERNATIONAL;
28
SET NO: ONE

ORIGINAL

1 Corporation.

2 8. All settlement agreements or other contracts entered
3 into by CSI and/or any of the entities or individuals listed or
4 referred to in paragraph 1 of the "Mutual Release of All Claims
5 and Settlement Agreement" of December, 1986, a copy of which is
6 attached to the Complaint in this action as Exhibit A, with each
7 of the following attorneys, litigants or claimants: Michael J.
8 Flynn, Julia Dragojevic, Bruce Bunch, Michael Tabb, Walt Logan,
9 Garry P. McMurry, William Franks, Laurel Sullivan, Howard Schomer,
10 Gabriel Cazares, Nancy McLean, John McLean, Tonja Burden, Margery
11 Wakefield, Edward Walters, Martin Samuels, Nancy Dincalci, Kima
12 Douglas, Michael Douglas, Robert Dardano, Warren Friske, Tonja
13 Burden, and/or Julie Christofferson.

14 9. All declarations or affidavits signed by any of the
15 individuals named in paragraph 16 above in connection with or as a
16 part of any settlement entered into between said individuals and
17 CSI or any of the entities or individuals listed or referred to in
18 paragraph 1 of the "Mutual Release of All Claims and Settlement
19 Agreement" of December, 1986, a copy of which is attached to the
20 Complaint in this action as Exhibit A;

21 10. All documents of any kind given to any member of the
22 media or any media company or organization at any time by CSI or
23 any of the entities or individuals listed or referred to in
24 paragraph 1 of the "Mutual Release of All Claims and Settlement
25 Agreement" of December, 1986, a copy of which is attached to the
26 Complaint in this action as Exhibit A, which mention, concern or
27 relate in any way to Gerald Armstrong;

28 11. All documents of any kind given to any member of the

PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following documents: CROSS-COMPLAINANT AND DEFENDANT ARMSTRONG'S FIRST INSPECTION DEMAND TO PLAINTIFF CHURCH OF SCIENTOLOGY INTERNATIONAL

on the following person(s) on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Andrew Wilson, Esquire
WILSON, RYAN & CAMPILONGO
235 Montgomery Street, Suite 450
San Francisco, California 94104

LAURIE J. BARTILSON, ESQ.
Bowles & Moxon
6255 Sunset Boulevard, Suite 2000
Los Angeles, California 90028

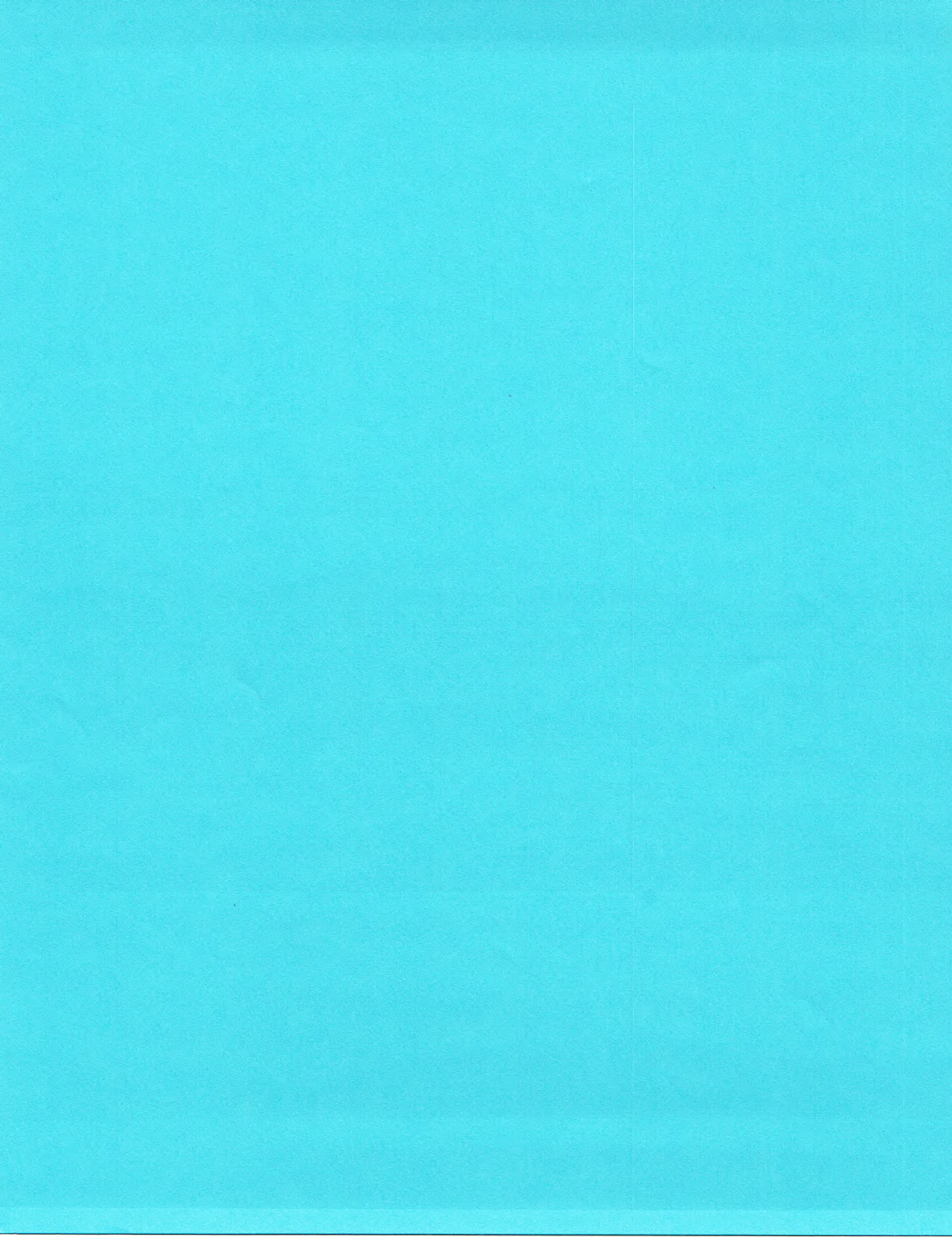
Michael L. Walton, Esquire
P.O. Box 751
San Anselmo, CA 94979

[x] (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

[x] (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: March 21, 1994





Who Is Gerald Armstrong?

PFL/DEPT EXHIBIT 1
WIT: John Farny
PENNY L. GILMORE, Reporter

7-11-94

"We don't have to prove a goddam thing. We don't have to prove sh-t. We just have to allege it."

— Gerald Armstrong

Who Is Gerald Armstrong?

Gerald Armstrong is a former clerk for the Church of Scientology of California who, in December 1981, left the Church and took with him more than 10,000 pages of records that did not belong to him.

In late 1984, a police-sanctioned investigation of Armstrong discovered that he was engaged in a bizarre scheme to take over Church assets.

Armstrong was working in collaboration with two men, known as "Joey" and "Mike", whom he believed to be staff members of the Church who were disaffected with Church management. This was not the case, however, and unknown to Armstrong at the time, his plotting with "Joey" and "Mike" was videotaped.

Armstrong's claim in court that he lived in fear of the Church was shown during these conversations to be a sham:

"JOEY": "Well you're not hiding!"

ARMSTRONG: "Huh?"

"JOEY": "You're not hiding."

ARMSTRONG: "F-k no! And ..."

"JOEY": "You're not afraid, are you?"

ARMSTRONG: "No! And that's why I'm in a f-king stronger position than they are!"

"JOEY": "How's that?"

ARMSTRONG: "Why, I'll bring them to their knees!" SECTION 1

Armstrong wanted "Joey" to plant in the Church's files documents fabricated by Armstrong, who planned to tell the IRS office in Los Angeles to conduct a raid against the Church and find the "incriminating" documents. He reassured "Joey" that he would be able to create the needed documents "with relative ease" since he had done "it for a living."

Armstrong explained to "Joey" how he intended to go about forging the faked documents:

ARMSTRONG: "So it seems to me that the use of the communication lines, I don't know maybe you guys are using them, but it seems to me that you don't have a way of printing anything to get an issue on the lines, used for anything. Right? I'm

saying that I can do it. I can type those goddam things and duplicate them and make them look exactly the same. You can't, you would not be able to tell the difference."

Armstrong's program to remove current Church management included the filing of a civil suit, based on evidence that he would manufacture. In a conversation with "Mike", Armstrong insisted that the suit could be launched based on manufactured allegations.

ARMSTRONG: "They can *allege* it! They can *allege* it! They don't even have - they can *allege* it!"

"MIKE": "So, they don't have to -- like, they don't have to have the document sitting in front of them, and then...."

ARMSTRONG: "I'm f-king saying the organization destroys the documents....!"

"MIKE": "The point -- the point I'm trying to get across is that that's not criminal. That's the -- that's the civil complaint in there and that would have to be proven."

ARMSTRONG: "Show me the lines you're talking about."

"MIKE": "Well, it's over here."

ARMSTRONG: "Where are the -- we don't have to prove a goddam thing. We don't have to prove sh-t. We just have to *allege* it. SECTION 2

Armstrong instructed "Joey" how to lie under oath about their plans to disrupt Church management. Armstrong wanted him, if deposed, to say that he and Armstrong had merely discussed a "global settlement" of Church litigation.

ARMSTRONG: "OK, what are our conversations, should it come down to it?"

"JOEY": "What do you mean?"

ARMSTRONG: "What do we talk about? You're deposed. You walk out there, and there's a PI hands you a paper, saying you're deposed, Jack, and not only that, you're out of the organization. And what do you say in deposition. Well, Armstrong and I talked about this, and he had a whole bunch of ideas about how to infiltrate the communication lines and spread turmoil and disaster, you know. What are we doing here? That's my question, before I tell you my ideas on documents."

"JOEY": "Well, what I got is basically -- Loyalists [Loyalists was an invented name for Armstrong's "co-conspirators"] gotta -- we gotta move -- we've got the suit coming up and I guess we need other lines to get stuff going. ..."

ARMSTRONG: "OK. So as far as the doc ... Let me just say, ah, you and I get together, we get together because we have a goal of global settlement. You have felt

that the turmoil and abuses and so on have gone on too long ... Hence we get together and discuss things. We have not discussed anything about a destruction of the tech, or Scientology is bad, or anything like that. Are we agreed?"

SECTION 3

Breaches of Agreement

Armstrong's plan to take over Church management was foiled and in December 1986 he agreed to resolve his differences with the Church.

One of the settlement conditions was that he would not assist any persons litigating any claims against the Church. Armstrong has since changed his story about signing the settlement agreement and now claims that he was pressured into signing it, but that he put on a happy face and proceeded to sign and go along with it.

However, it is obvious from the video and transcript of Armstrong signing the settlement agreement that he knew exactly what he was doing. SECTION 4 (video is available)

In 1990, Armstrong began to undertake actions which directly violated the agreement he had made. This placed him at risk that the Church would move to collect the damages that Armstrong's breaches entitled it to. To make it impossible for the Church to collect any damages, he fraudulently conveyed all his property including real property, personal property and cash to his friends and to a corporation he set up for that purpose, which he called, "The Gerald Armstrong Corporation."

One of the recipients of Armstrong's assets was an attorney named Michael Walton. Prior to signing the settlement agreement with the Church, Walton had advised Armstrong about the terms and conditions of the agreement. Walton also knew of Armstrong's intention to breach the agreement and was thus fully aware of the fraudulent nature of the conveyance. SECTION 5

After transferring his assets, Armstrong went to the media and, in an eccentric interview, told them that he had given away all his money. SECTION 6

In early 1992, a lawsuit was filed against Armstrong to enforce the settlement agreement on him. On May 28, 1992, a preliminary injunction was ordered specifically prohibiting Armstrong from assisting any person arbitrating or litigating a claim against the Church. SECTION 7

Despite this order, Armstrong has continued to violate the settlement agreement. He has now stated both in deposition and in his letters that he has no intention of abiding by the preliminary injunction and that no court can order him to abide by the settlement agreement. SECTION 8

Ford Greene

Armstrong's attorney, Ford Greene, has been a long-time attacker of religious

movements. He has a history of using frivolous litigation tactics to delay and prevent cases from being tried. In August 1992, Greene was forced to pay \$6,167.23 in sanctions, plus \$797.81 in costs, to a fellow-attorney after Greene's dishonest and unprofessional litigation tactics were exposed in court.

The Sonoma Superior Court in California ordered Greene to compensate attorney John Maderious, who had been trying for eighteen months to bring to trial a case in which Greene represented the plaintiff. The case, once at trial, could have been disposed of in one hour. Maderious's declaration to the Court described Greene's stalling tactics, his deception and his purposeful failure to abide by court rules. SECTION 9

Maderious stated that, *"Mr. Greene enjoys a unique status in my office. Mr. Greene is the only attorney I have had any contact with in almost twenty years of practice who I refuse to speak with on the telephone. My response to telephone calls to Mr. Greene is to have my secretary tell him to fax anything to me that he has to tell me since I do not wish to talk to him on the phone. The reason for this is that Mr. Greene has demonstrated to me repeatedly that he is willing to say anything to attempt to further his interests, regardless of the truth."*

oOo